

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Revision of the Commission's Rules)	
To Ensure Compatibility with)	
Enhanced 911 Emergency Calling Systems)	
)	CC Docket No. 94-102
Wireless E911 Phase II Implementation)	
Plan of Nextel Communications, Inc.)	
)	
Request for Waiver by Sprint Spectrum L.P.,)	
d/b/a Sprint PCS)	
_____)	

SPRINT NEXTEL CORPORATION
E911 DEPLOYMENT STATUS REPORT
May 1, 2006

Sprint Nextel Corporation ("SN" or "Company")¹ hereby submits additional information regarding its E911 deployment status.²

¹ Sprint Nextel Corporation is the result of a merger between Sprint Corporation and Nextel Communications, Inc., which closed on August 12, 2005. The terms "Sprint" and "Nextel" refer to those entities as they existed prior to the closing of that transaction.

² SN files this submission on a voluntary basis because the obligation set forth in the Federal Communications Commission's ("Commission" or "FCC") October 12, 2001, *Sprint Waiver Order, In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Request for Waiver by Sprint Spectrum L.P. d/b/a Sprint PCS*, Order, CC Docket 94-102, 16 FCC Rcd 18330 (2001) ("*Sprint Waiver Order*"), and *Nextel Waiver Order, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Wireless E911 Phase II Implementation Plan of Nextel Communications, Inc.*, Order, CC Docket No. 94-102, 16 FCC Rcd 18277 (2001) ("*Nextel Waiver Order*"), extended only through the February 1, 2006, Quarterly Report.

I. INTRODUCTION

During the first quarter of 2006, SN completed a combined 332 Phase I PSAP deployments and 373 Phase II deployments on both its Code Division Multiple Access (“CDMA”) and integrated Digital Enhanced Network (“iDEN™”) networks. During this time period, SN brought its total Phase I deployments to 3,530 PSAPs on its combined networks and its total Phase II deployments to 2,777 PSAPs.³ Phase I and II services are now available in portions of 48 states, Puerto Rico and the District of Columbia.

SN remains committed to providing its customers and public safety officials with E911 Phase I and II service throughout its network. SN was the first carrier to begin selling Global Position System (“GPS”) enabled handsets, the first carrier to deploy a handset based Phase II network, and the first to convert 100% of new activations on its CDMA network to GPS-enabled devices. As SN anticipated in its *Waiver Petition* filed on September 29, 2005,⁴ however, it was unable to meet the requirement that 95% of its existing customer base be GPS enabled by December 31, 2005. As discussed in the *Waiver Petition*, a latent software defect in certain Assisted Global Positioning System (“A-GPS”) handsets resulted in a malfunction of

³ Specific information regarding these PSAP deployments is contained in Appendix A to this Quarterly Report. As shown in that appendix, there is significant overlap in the deployments listed for each network. These numbers reflect unique PSAP deployments. If CDMA and iDEN deployments are counted separately, SN has deployed 5,009 Phase I requests and 3,907 Phase II requests.

⁴ *Sprint Nextel Corporation Request for Limited Waiver*, CC Docket No. 94-102, filed September 29, 2005 (“*Waiver Petition*”).

the E911 Phase II location capability in all iDEN Phase II-compliant handsets on July 17, 2004. This combined with other circumstances affecting legacy Nextel's conversion efforts have led SN to seek a waiver of the Commission's 95% handset deployment rule until December 31, 2007.⁵ Notwithstanding this failure, SN notes that as of December 31, 2005, it had distributed over 68 million GPS enabled handsets. SN further notes that its GPS handset penetration rate now exceeds 84% and, if the Motorola software defect had not occurred, the penetration rate would now exceed 90%.

This report contains information regarding the status of SN's enhanced 911 deployment efforts through the end of the first quarter of 2006, but does not duplicate all of the information provided to the Commission in previous filings. Sprint and Nextel's previous Quarterly E911 Reports and filings in this docket provide additional information regarding the issues surrounding the deployment of Phase I and II services and SN's compliance with the Commission's rules and those filings are incorporated herein by reference.⁶

II. CURRENT STATUS OF PHASE I AND II REQUESTS

A. Phase I Status

SN has worked cooperatively with PSAPs across the country to deploy Phase I (cell site/sector location) E911 services. As of March 31, 2006, SN is providing Phase I E911 services on its CDMA network to approximately 3,140 PSAPs, which

⁵ See *Waiver Petition* at 6, 14-20.

represents the addition of approximately 180 Phase I systems from last quarter. On its iDEN network, SN is providing Phase I E911 service to approximately 1,869 PSAPs, an addition of 152 Phase I systems during the quarter. These numbers represent deployments within 3,530 unique PSAPs. Details regarding the status of Phase I requests on SN's CDMA and iDEN networks are contained within Appendix A to this report.

The "Date PSAP Made Request" column in Appendix A indicates the date a PSAP request was issued, even if the PSAP did not at that time meet the prerequisites of Rule 20.18. SN's objective is to deploy Phase I with as many PSAPs as possible. Accordingly, SN has not attempted to segregate those requests as valid or invalid under the prerequisites contained in Rule 20.18, but has moved forward on all requests. Where deployment is not possible within six months of a request, SN has established an agreed upon deployment schedule as permitted under the Commission's *Richardson Reconsideration Order*.⁷ At the Commission's request, Sprint will provide additional information with respect to specific deployments and PSAP circumstances presented in each case.

B. Phase II Status

SN continues to deploy Phase II services to requesting PSAPs. SN launched 199 new PSAPs on its CDMA network and 174 new PSAPs on its iDEN network in

⁶ See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Quarterly Reports of Sprint Corporation and Nextel Communications, Inc. beginning February 1, 2002.

⁷ *In the Matter of Petition of City of Richardson Texas*, Order on Reconsideration, CC Docket 94-102, FCC 02-318, (2002) at ¶29.

the last quarter bringing total CDMA deployments to 2,397 PSAPs and total iDEN deployments to 1,510 PSAPs. These numbers reflect 2,777 unique PSAP deployments. Details regarding the status of specific Phase II requests are contained in Appendix A attached hereto.

As with Phase I requests, SN has not attempted to segregate Phase II requests based upon validity under the *Richardson Order*, and the Company has moved forward with implementation efforts for all requesting PSAPs. SN has reached an agreed-upon implementation schedule with each of the Phase II requesting PSAPs as permitted under the *Richardson Reconsideration Order* and accordingly, SN is in compliance with the Commission's rules regardless of the validity of a given request. Moreover, and as also discussed in previous filings, where a PSAP has made a Phase II request, and the ALI provider has not upgraded its ALI database, or prohibits the use of that ALI database contingent upon state regulatory authority approval of the ALI provider's tariff filing, the PSAP is unable to receive or utilize Phase II information. To confirm, a PSAP will be unable to receive Phase II data unless the necessary ALI and CPE upgrades have been performed.⁸

III. NETWORK READINESS

As previously advised, SN completed all necessary network upgrades by the Commission's benchmark dates. In fact, SN completed the required installation of all national platforms and upgrades to its CDMA network infrastructure ahead of

⁸ See Sprint Reply Comments in Support of its Petition for Reconsideration and Clarification, CC Docket No. 94-102 (Jan. 28, 2002).

the Commission's schedule. SN's CDMA network has now been Phase II enabled for more than three years.

IV. CURRENT HANDSET ACTIVATIONS AND SALES

SN was the first carrier to effectively meet the Commission's 100% new activation requirement on its CDMA network during the third quarter of 2003.⁹ SN effectively met its 100% activation requirement for its iDEN network during the first quarter of 2005.¹⁰ SN has introduced more than forty GPS-enabled handset models on its CDMA network since October 1, 2001, and more than twenty-five GPS-enabled handset models on its iDEN network since October 1, 2002. Indeed, many of the early GPS handset models have been retired as obsolete. All new handset models introduced by SN are GPS enabled, and have been since January of 2003 on its CDMA network and since February 2004 on its iDEN network (with the exception of one BlackBerry model that is no longer available). As of the end of the fourth quarter of 2005, SN had distributed over 68 million GPS-enabled handsets.

V. COMPLIANCE WITH OUTSTANDING BENCHMARKS

SN has met all benchmarks set for its CDMA and iDEN networks through the end of the fourth quarter of 2005, with the exception of the December 31, 2005, 95% handset penetration benchmark. Details of SN's activities are con-

⁹ See Sprint Corporation Seventh Quarterly E911 Implementation Report (filed August 1, 2003) at 1-3; Sprint Corporation Eighth Quarterly E911 Implementation Report (November 1, 2003) at 2.

¹⁰ See Nextel Communications, Inc. Phase I and Phase II E911 Quarterly Report (February 1, 2005) at 11-12.

tained in previously filed Quarterly Reports. As discussed above, the FCC requires CMRS carriers deploying handset based Phase II enhanced 911 systems to ensure that 95% of their embedded handset bases are GPS enabled by December 31, 2005.¹¹ SN has taken the December 2005 benchmark seriously and has devoted substantial resources to maximize its GPS handset penetration rate. SN has sought a limited waiver due to its inability to meet the 95% handset penetration benchmark. SN's current GPS handset penetration rate now exceeds 84% and if the software defect had not occurred, the penetration rate would exceed 90%.

The rules provide that handset-based location solutions must provide the location of wireless 911 calls with an accuracy of 50 meters for 67 percent of calls and 150 meters for 95 percent of calls.¹² Prior to deploying the assisted GPS solution on its CDMA system, SN conducted testing in conjunction with its vendors to determine whether the A-GPS system would meet FCC standards. After deploying the system, SN conducted field tests in various markets to validate that the CDMA system was operating properly. SN, using an independent third-party consultant, also completed accuracy testing prior to launching its iDEN A-GPS enabled system and met the Commission's standards. SN or its vendors also test each new GPS handset model as it is introduced into the market to ensure that it meets expected performance parameters. Based upon this information, SN believes that its current location technology satisfies the FCC's accuracy requirements regarding network performance.

¹¹ 47 C.F.R. §20.18(g)(1)(v).

Additional specific standards for testing accuracy have recently been completed by the Network Reliability and Interoperability Council ("NRIC") and are being further defined by the Emergency Services Interconnection Forum. SN has begun to develop the systems and processes that would meet these testing protocols and intends to conduct testing in compliance with these standards and timelines when finalized. SN further notes that the basic operational characteristics of this technology will not change based upon the amount of testing conducted.

VI. CONCLUSION

SN remains committed to E911 deployment efforts and to working with public safety in this important area.

Respectfully submitted,

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¹² 47 C.F.R. § 20.18(h)(2).

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